

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Crim. No. 19-10195-WGY
(1)HAOYANG YU, and	)	
	)	
(2)TRICON MMIC, LLC,	)	
	)	
Defendants.	)	

INITIAL STATUS CONFERENCE – JOINT MEMORANDUM

Pursuant to Local Rule of Criminal Procedure 116.5(a), the United States, by and through its undersigned counsel, and defendants, Haoyang Yu (“Yu”) and Tricon MMIC LLC (“Tricon”), by and through their undersigned counsel, respectfully submit this joint memorandum.

(1) The status of automatic discovery and any pending discovery requests - The government has produced all automatic discovery materials. There are no pending discovery requests.

(2) The timing of any additional discovery to be produced – As noted above, the government has already provided the defendants automatic discovery. The government will produce any materials required under Local Rule 116.2(b)(2) in accordance with that rule.

(3) The timing of any additional discovery requests - The defendants request until October 28, 2019 to file any discovery requests.

(4) Protective Orders - A protective order was entered in this case by this Court on July 10, 2019.

(5) Pretrial motions under Fed. R. Crim. P. 12(b) - The defendants request an opportunity to review discovery before a date is set for the filing of pre-trial motions under

Federal Rule of Criminal Procedure 12(b).

(6) Timing of expert disclosures – Should expert testimony prove necessary, the government will provide expert discovery no later than 45 days before trial. Defendants will provide reciprocal expert discovery no later than 30 days before trial.

(7) Speedy Trial Act calculations - The 70-day period specified in 18 U.S.C. § 3161(c)(1) commenced on June 19, 2019, with the defendants' arraignments. The Court ordered the period from June 19, 2019 – September 9, 2019 (the date the initial status was originally scheduled at the request of the defendant) to be excluded from the Speedy Trial clock pursuant to an assented-to government motion to exclude time, which was filed in this matter. This time was excluded on the grounds that the ends of justice served by permitting the defendants to complete their review of the discovery materials outweighs the defendants' and public's interest in a speedy trial under 18 U.S.C. § 3161(h)(7)(A). The period of September 16, 2019 to September 18, 2019 is also excluded under 18 U.S.C. § 3161(h)(1)(D).

Respectfully submitted,

Andrew E. Lelling  
United States Attorney

Haoyang Yu, and  
Tricon MMIC LLC

By: /s/ B. Stephanie Siegmann  
B. Stephanie Siegmann  
George Varghese  
Assistant U.S. Attorneys

By: /s/ William Fick  
William Fick, Esq.  
Counsel for Haoyang Yu and Tricon  
MMIC LLC